

Federal Defenders OF NEW YORK, INC.

Southern District
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Leonard F. Joy

July 14, 2008

Southern District of New York
John J. Byrnes
Attorney-in-Charge

Executive Director
Via Facsimile

Honorable Shira A. Scheindlin
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Natacha Joseph
07 Cr. 785 (SAS)

Dear Judge Scheindlin:

I write on behalf of my client, Natacha Joseph, to request a brief adjournment of a pretrial conference in the above-referenced case currently scheduled for Wednesday June-16 at 4:30.

The government has recommended a deferred prosecution in this case. Pretrial services has concluded their investigation and is prepared to agree with the government's recommendation. Ms. Joseph lives in Virginia and is studying to become a nurse. She has final exams this week, and traveling to New York for the execution of the deferred prosecution on Wednesday would have an adverse effect on her performance. In consequence, I request that the Court adjourn the next conference until the week of July 21 so that Ms. Joseph's finals schedule is not interrupted. If the Court prefers to refer the case to Magistrate's Court for the execution of the agreement, the parties can schedule an appearance in Magistrate's Court during that week. Assistant United States Attorney Todd Blanche has informed me that the government consents to this adjournment request.

The government requests that time between July 16 and the adjourn date be excluded from any speedy trial calculation. On behalf of Ms. Joseph, I consent to that exclusion.

Thank you for your time and consideration of this matter.

Respectfully submitted,

Peggy M. Cross

Peggy M. Cross
Assistant Federal Defender
Tel.: (212) 417-8732

cc: AUSA Todd Blanche